

Q. You did that because Jason Galanis had asked you to, correct?

A. Again I don't remember specifically signing this, but --

Q. Well, in general -- I don't want to have to go through each piece of paper -- you signed papers in connection with the bond issuance, correct?

A. Yes.

Q. Throughout that process, the only person that you spoke to was Jason Galanis about the bonds, true?

A. Jason Galanis, Gary Hirst and Hugh Dunkerley.

Francisco Martin Fernandez, Tr. 2328

Q. Mr. Dunkerley, just recapping on your testimony yesterday, you testified that you saw -- how many years were you working with Jason Galanis?

A. About two or three years, I think.

Q. You said that in your life basically you've only met Mr. Cooney on two or three times on social occasions, correct?

A. Correct.

Q. You testified that Mr. Cooney was a great guy?

A. Absolutely.

Q. And you were never together at 1920 Bel Aire, correct?

A. Never.

Q. And you testified that it was not a common occurrence for you to email Mr. Cooney, correct?

A. Correct.

Q. In fact, you had difficulty remembering even one email that you had with him?

A. Yes.

Q. You said that you never spoke to Mr. Cooney about the WLCC bonds?

A. Never.

Q. And you testified that Jason Galanis lied to you, correct?

A. Yes.

Dunkerley, Tr. 1298

Q. In fact, we don't need to look at it, but one of the fake documents that was created was an agreement between Thorsdale and Calvert, right?

Dunkerley, Tr. 1466

A. Yes.

Q. I want to talk now a little bit about Calvert Capital?

A. Yes.

Q. You testified last week that one of the crimes that you have pleaded guilty to was obstruction of justice, true?

A. True.

Q. And that included the falsification of documents, right?

A. True.

Q. And you were directly involved in creating or signing those false documents, correct?

A. Yes.

Dunkerley, Tr. 1450

Q. And Calvert's sole purpose was to deceive people, correct?

A. Yes.

Q. And again the only people that you ever discussed Calvert and its illicit purpose with were Gary Hirst and Jason Galanis, true?

A. True.

Dunkerley, Tr. 1508